

## **Remarks**

Claims 1-37 are pending in the application. No claims have been cancelled, amended, or added. In view of the following remarks, allowance of all the claims pending in the application is requested.

### **Rejections Under 35 USC § 103**

The Examiner has rejected claims 1-20, 23, 25-27 and 29-37 under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,016,478 to Zhang, *et al.*, ("Zhang"), in view of Meeting Maker XP as disclosed in "Meeting Maker XP: ON Technology Takes Its Group Scheduled Cross-Platform" by Rizzo ("Rizzo"). The Examiner has rejected claims 21, 22, 24, and 28 under 35 U.S.C. § 103 as allegedly being unpatentable over Zhang in view of Rizzo and further in view of U.S. Patent No. 5,790,974 to Tognazzi ("Tognazzi"). Applicants traverse these rejections because the references, either alone or in combination with one another fail to teach or suggest the claimed invention.

Each of the references individually fails to teach or suggest various aspects of the claimed invention. For example, claim 1, in pertinent part, recites:

database means in communication with one or more server means for storing one or more invitee profiles for one or more potential invitees of the system, the one or more invitee profiles comprising user profiles ***wherein each user profile comprises information regarding available and unavailable times for that user and an electronic mail address for the user...***

In addition to other aspects of the claimed invention, Zhang fails to teach or suggest a user profile that includes available and unavailable times for a user. In addition to other aspects of the claimed invention, Rizzo fails to teach or suggest a user profile that includes an electronic mail address for the user.

Apparently, the Examiner relies on the combination of Zhang and Rizzo to teach this and other features of the claimed invention. However, the Examiner fails to provide a proper motivation for one of ordinary skill to combine the references in the manner apparently suggested by the Examiner.

Zhang is directed toward a group scheduling system that purportedly utilizes electronic mail so that participants in the system need not employ or be connected to a particular proprietary system. See *e.g.*, Zhang at col. 1, line 66 to col. 2, line 13. In other words, the architecture apparently taught by Zhang does not require that participants have a local copy of a component of the group scheduling system installed on their respective computers. As a result, however, Zhang does not teach or suggest various aspects of the claimed invention including the user profile that includes available and unavailable times for a user as discussed above.

In contrast, Rizzo is directed toward a scheduling system that requires users to have a locally installed component on their respective computers. This architecture apparently allows the system of Rizzo to rely on various standard network protocols to coordinate meetings over cross-platform networks. However, Rizzo is silent with regard to a user profile that includes an electronic mail address for the user.

Given the differences in these two architectures, it is not clear how or why one of ordinary skill in the art would combine the references in the manner suggested by the Examiner, much less to be motivated to do so, to arrive at the claimed invention. The references themselves fail to provide the requisite motivation or suggestion for this combination. Accordingly, the Examiner has failed to set for a *prima facie* case of obviousness based on Zhang in view of Rizzo, and the rejection of claim 1 must be withdrawn.

Each of independent claims 5, 6, 7, 17, 26 and 30 include features similar to those of claim 1 and hence the rejection of these claims based on Zhang in view of Rizzo must also be withdrawn. The remaining pending claims depend from and add features to one of these independent claims. For at least this reason, the rejections of the dependent claims must also be withdrawn. With regard to claims 21, 22, 24, and 28, Tognazzi fails to address the deficiencies of Zhang and Rizzo as set forth above; hence, the rejection of these claims must also be withdrawn.

***Requirement for Information Under 37 CFR § 1.105***

The Examiner has requested information regarding both assignee's and/or Applicants' related products, including, but not limited to, Lotus Notes, Lotus Organizer, and the calendaring and scheduling (C&S) application and how the claimed invention differs from the functionality integrated into these products.

The Examiner has also requested information regarding who performed the Domino beta testing (e.g., was it performed internally or contracted out), if there were any confidentiality agreements relating to said Domino beta testing, and what were the differences, if any, between the beta tested Domino version of Lotus Notes and the claimed invention.

By way of clarification, earlier versions of Lotus Notes included a Lotus Notes client-side application and a Lotus Notes server-side application. On or about version 4.5, "Lotus Notes" began to be used in reference to this and subsequent versions of the client-side application while "Domino" was used in reference to this and subsequent versions of the server-side application.

With regard to the Examiner's first request, Applicants direct the Examiner to the specification regarding the differences between these products and the claimed invention.

With regard to the Examiner's second request, Applicants acknowledge that Lotus Notes Release 4.5 included one or more embodiments of the claimed invention. Applicants acknowledge that a version of Lotus Notes Release 4.5 was provided for testing in July 1996. This version was identified as part of an internal and confidential test program. Applicants acknowledge that another version of Lotus Notes Release 4.5 was provided for testing in October 1996. This version was identified as for internal use only.

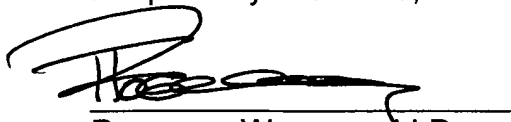
Some of the information responsive to the Examiner's request is not readily available; however, Applicants will continue to in its attempts to ascertain this information if deemed necessary by the Examiner.

### ***Conclusion***

Applicants believe that a full and complete response has been made to the Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,



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